

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

IN RE PORK ANTITRUST  
LITIGATION

Case No. 0:18-cv-01776 (JRT-JFD)

*This Document Relates to:*

All Consumer Indirect Purchaser Actions

**FURTHER DECLARATION OF  
SHANA E. SCARLETT IN  
SUPPORT OF CONSUMER  
INDIRECT PURCHASER  
PLAINTIFFS' (1) REPLY IN  
SUPPORT OF MOTION FOR  
CLASS CERTIFICATION; AND (2)  
OPPOSITION TO DEFENDANTS'  
MOTION TO EXCLUDE THE  
TESTIMONY OF DR. HAL SINGER**

I, Shana E. Scarlett, state under oath, as follows:

1. I am a partner at Hagens Berman Sobol Shapiro LLP. I am admitted to this Court *pro hac vice* and am one of the Interim Co-Lead Counsel (along with Gustafson Gluek PLLC) for the Consumer Indirect Purchaser Plaintiffs appointed by the Court to represent the Consumer Indirect Class in this litigation. I submit this declaration in support of CIPPs' Reply in Support of Motion for Class Certification and CIPPs' Opposition to Defendants' Motion to Exclude the Testimony of Dr. Hal Singer. I have full knowledge of the matters stated herein and would testify to these facts if called upon.

2. Attached hereto are true and correct copies of the following exhibits:

<b>Exhibit</b>	<b>Description</b>
152.	SMITHFIELD01061844
153.	Deposition of Jerry Lehenbauer (Sept. 21, 2022)
154.	Deposition of Rodney Brenneman (Aug. 4, 2022)
155.	Deposition of Douglas C. Clemens (Aug. 17, 2022)
156.	JBS Foods International B.V. Form F-1 (2017), available at <a href="https://www.sec.gov/Archives/edgar/data/1691004/000119312516785274/d304020dfl.htm">https://www.sec.gov/Archives/edgar/data/1691004/000119312516785274/d304020dfl.htm</a>
157.	JBS-PORK-00143705
158.	TF-P-002024677
159.	TF-P-000743209
160.	Deposition of Shayle D. Shagam (June 1, 2022)
161.	Deposition of Dr. James Mintert, Ph.D. (Nov. 9, 2022)
162.	TF-P-001864370

163.	AGSTAT-P-0003406624
164.	Deposition of Jason Kurtz (Aug. 29, 2022)
165.	JBS-PORK-02096990
166.	KERNS00181720
167.	KERNS00042249
168.	TF-P-001563315
169.	HFC-PORKAT0000261842
170.	KERNS00028102
171.	Our Story - Prestage Foods, available at <a href="https://www.prestagefoods.com/about/">https://www.prestagefoods.com/about/</a> (last visited Nov. 17, 2022)
172.	SMITHFIELD00433644
173.	TF-P-002246725
174.	Deposition of Dale DeGroot (Sept. 23, 2023)
175.	SMITHFIELD00828142
176.	KERNS00188623
177.	KERNS00193870
178.	KERNS00195812
179.	KERNS00215077
180.	KERNS00195683
181.	HFC-PORKAT0000060138
182.	TF-P-002388199
183.	KERNS00200709
184.	SMITHFIELD02229051
185.	SMITHFIELD01064551

186.	Deposition of Daniel Groff (Dec. 15, 2021)
187.	SMITHFIELD00874019
188.	Deposition of Steven Meyer, Ph.D. (Apr. 26, 2022)
189.	HFC-PORKAT0000258382
190.	JBS-PORK-02476820
191.	SBF0184924
192.	AGSTAT-P-0003014046
193.	JBS-PORK-00729359
194.	SMITHFIELD01091105
195.	SMITHFIELD00837722
196.	Deposition of Howard Thomas Hill (Aug. 29, 2022)
197.	TRI0000052167
198.	Deposition of Donald J. Temperley (Aug. 31, 2022)
199.	Deposition of Brian Taphorn (Jan. 25, 2022)
200.	SMITHFIELD02021865
201.	TF-P-002153432
202.	JBS-PORK-02182977
203.	TF-P-000134683
204.	SMITHFIELD04914384
205.	HFC-PORKAT0000153244
206.	TF-P-000128976
207.	SMITHFIELD00460210
208.	TF-P-000219855

209.	TF-P-000642134
210.	SBF0311731
211.	Exhibit 1648 to the deposition of Duke Sand (Oct. 12, 2022)
212.	JBS-PORK-01141336
213.	SBF0314725
214.	SBF0971082
215.	SMITHFIELD04912814
216.	HFC-PORKAT0000068283
217.	HFC-PORKAT0000064704
218.	VG-P-0000005281
219.	VG-P-0000005312
220.	SMITHFIELD01167346
221.	TF-P-001996515
222.	SMITHFIELD04803907
223.	TF-P-002001290
224.	JBS-PORK-02481149
225.	JBS-PORK-02479335
226.	JBS-PORK-02444744
227.	SBF0080489
228.	JBS-PORK-02477717
229.	HFC-PORKAT0000095315
230.	Deposition of Nick Schweitzer (Oct. 12, 2022)
231.	TF-P-000036196

232.	JBS-PORK-01983967
233.	JBS-PORK-00570261
234.	SMITHFIELD00302238
235.	SMITHFIELD04831155
236.	SBF0437621
237.	JBS-PORK-01215771
238.	TRI0000313900
239.	TRI0000313664
240.	CLMNS-0000333998
241.	CLMNS-0000655538
242.	HFC-PORKAT0000209857
243.	JBS-PORK-01993559
244.	SBF0149705
245.	Deposition of Kenneth M. Grannas, Jr. (Dec. 17, 2021)
246.	TF-P-000218497
247.	SMITHFIELD00882452
248.	Deposition of Scott Saunders (Aug. 11, 2022)
249.	Deposition of Curtis Stegall (May 25, 2022)
250.	Members Discuss Trade Responses to H1N1 flu (June 25, 2009), available at <a href="https://www.wto.org/english/news_e/news09_e/sps_25jun09_e.htm">https://www.wto.org/english/news_e/news09_e/sps_25jun09_e.htm</a>
251.	Exhibit 8 to the deposition of Seth Meyer, Ph. D. (June 15, 2022)
252.	China Reopens Market to U.S. Pork (May 14, 2010), available at <a href="https://www.farmanddairy.com/news/china-reopens-market-to-us-pork/14922.html">https://www.farmanddairy.com/news/china-reopens-market-to-us-pork/14922.html</a>

253.	TF-P-002349999
254.	SBF0276226
255.	SMITHFIELD02239928
256.	TF-P-000076737
257.	SBF0459029
258.	SMITHFIELD04934968
259.	TF-P-001572423
260.	JBS-PORK-00754219
261.	TF-P-000304473
262.	TF-P-000538548
263.	TF-P-000515626
264.	SBF0459029
265.	TRI0000089336
266.	SBF0490482
267.	SBF0538947
268.	Compilation of named plaintiff deposition transcripts cited in Appendix A to Reply in Support of Motion for Class Certification
269.	SMITHFIELD04739834
270.	AGSTAT-P-0003410325
271.	21CForum-0000008944
272.	HFC-PORKAT0000200877
273.	Deposition of Tim Hiller (Oct. 14, 2022)
274.	HFC-PORKAT0000192472
275.	HFC-PORKAT0000197300

276.	Deposition of Brian Snyder (Oct. 20, 2022)
277.	Publix 30(b)(6) Deposition of Keith Barthelme (Oct. 4, 2022)
278.	The Golub Corp. 30(b)(6) Deposition of Christopher Wagner, Jr. (Oct. 10, 2022)
279.	Deposition of Dan Schneider (July 27, 2022)
280.	Deposition of Paul Peil (Dec. 9, 2021)
281.	SBF0143013
282.	SBF0175459
283.	HFC-PORKAT0000196923
284.	SMITHFIELD00676667
285.	TF-P-002345939
286.	JBS-PORK-01335804
287.	TF-P-002420429
288.	Deposition of Matthew McNeal (Sept. 13, 2022)
289.	Deposition of Josh Edwards (Oct. 14, 2022)
290.	Deposition of Hal Singer (June 24, 2022)
291.	TF-P-001564729
292.	TF-P-002574206
293.	AGSTAT-P-0003392076

I certify under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

DATED: November 18, 2022

/s/ Shana E. Scarlett  
SHANA E. SCARLETT